

1 JOHN J. FRENİ, ESQ. (Bar No. 132912)
A Professional Law Corporation
2 600 West Broadway, Suite 400
San Diego, CA 92101
3 (619) 557-9128; (619) 515-1197

4 Attorneys for Defendant, MARIO RENDA

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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 AIRLINES REPORTING CORPORATION,

11 Plaintiff/Judgment Creditor,

12 v.

13 COMMERCIAL TRAVEL
CORPORATION d/b/a MATLOCK
TRAVEL, *et al.*,

14 Defendants/Judgment Debtors.
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CASE NO. 08-MC-00088

OBJECTIONS OF DEFENDANT MARIO
RENDİ TO JULY 18, 2008, REPLY
DECLARATION OF SUZANNE LEWIS IN
SUPPORT OF MOTION FOR AN
ASSIGNMENT ORDER

Date: July 25, 2008
Time: 10:00 a.m.
Crm: 1, 4th Floor
Judge: Hon. Irma E. Gonzalez

Judgment: September 4, 2007

18 Defendant MARIO RENDA submits the following objections to the July 18, 2008,
19 Reply Declaration of Suzanne Lewis, Esq. submitted in support of Plaintiff AIRLINES
20 REPORTING CORPORATION's motion for an assignment order.

21 Page 2, paragraph 3, lines 1-4 and Exhibit "9"

22 Objection: Irrelevant, hearsay.

23 Page 2, paragraph 4, lines 5-7 and Exhibit "10"

24 Objection: Irrelevant, hearsay.

25 Page 2, paragraph 6, lines 10-13 and Exhibit "12"

26 Objections: Hearsay, best evidence.

27 Page 2, paragraph 7, ll. 13-15 and Exhibit "13"

28 Objections: Irrelevant, hearsay.

Page 2, paragraph 8, lines 16-17 and Exhibit "14"

Objections: Irrelevant, lacks foundation, best evidence, hearsay.

Page 2, paragraph 9, lines 18-20 and Exhibit "15"

Objections: Irrelevant, lacks foundation, best evidence, hearsay.

Page 2, paragraph 10, lines 21-22 and Exhibit "16"

Objections: Irrelevant, lacks foundation, best evidence, hearsay, inadmissible
settlement negotiations.

Page 3, paragraph 12, lines 1-12

Objections: Lacks foundation, hearsay, best evidence, argumentative.

Page 3, paragraph 14, line 19- page 4, paragraph 14, line 1

Objections: Irrelevant, hearsay, lacks foundation, argumentative. Ms. Lewis
concedes that she does not have personal knowledge sufficient to declare
the matters stated in this paragraph, and the matters themselves, which
all relate to Anthony Renda are irrelevant to the assignment motion.

Page 4, paragraph 15, lines 2-4

Objections: Irrelevant, lacks foundation, best evidence, hearsay, argumentative.
Ms. Lewis concedes that she does not have personal knowledge sufficient
to declare the matters stated in this paragraph, and even if true, the
statements are irrelevant to the assignment motion.

Page 4, paragraph 17, lines 9-14

Objection: Irrelevant, best evidence, lacks foundation, hearsay. The settlement
agreement between Anthony Renda and ARC contains no apportionment.
ARC's internal apportionments are irrelevant under California Code of
Civil Procedure section 877.

Page 4, paragraph 18, lines 16-17

Objection: Irrelevant. Any application or apportionment ARC has internally made
concerning settlement monies is irrelevant to this assignment motion,
because the settlement agreement, itself, contains no apportionment,

1 which is the controlling factor under California Code of Civil Procedure
2 section 877.

3 Page 4, paragraph 19, lines 17-19

4 Objection: Irrelevant.

5 Page 4, paragraph 20, lines 21-23

6 Objection: Irrelevant, argumentative.

7 Page 5, paragraph 21, lines 3-6

8 Objection: Hearsay, lacks foundation, best evidence, argumentative.

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10 Dated: July 21, 2008

JOHN J. FRENI, ESQ.
A Professional Law Corporation

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12 By: s/ JOHN J. FRENI, ESQ.
13 Attorneys for Defendant, MARIO RENDA
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